

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
Clarksburg

K.J.

Plaintiff,

v.

CIVIL ACTION NO. 1:21-CV-74
Judge Bailey

UNITED STATES OF AMERICA,
and OFFICER LARRY MARTIN,

Defendants.

PLAINTIFF'S EXPERT WITNESS DISCLOSURE

Now comes Plaintiff, by her counsel, in compliance with the controlling Scheduling Order in this action, Fed. R. Civ. P. 26(a)(2) and LRCivP 26.01(b), providing the following *Expert Witness Disclosure*:

Fed. R. Civ. P. 26(a)(2)(A) Disclosure

1. David S. Husted, M.D., M.S.
3365 Burns Road, Suite 203
Palm Beach Gardens, FL 33410
2. Cynthia Ivy, PsyD/DAP-C
Bureau of Prisons Psychology Services
3. T. Keener, RN
Bureau of Prisons Health Services
4. M. Mukhin, PsyD
Bureau of Prisons Health Services
5. Leigh Bird, PA-C
Bureau of Prisons Health Services

6. Xinyu Li, M.D.
Bureau of Prisons Health Services
7. Meghan Reilly, PsyD
Bureau of Prisons Psychology Services
8. Any/all other BOP health care providers who have provided any care to Plaintiff.

Fed. R. Civ. P. 26(a)(2)(B) Disclosure

A written report prepared and signed by David S. Husted, M.D., M.S. is attached hereto as *Exhibit A*. The report enumerates “Sources Of Data” some or all of which may be exhibited to the jury. Dr. Husted’s qualifications, including a list of publications he has authored or has contributed to authoring, is appended to his report as *Exhibit A-1*. A list of all other cases in which, during the previous 4 years, Dr. Husted testified as an expert at trial or by deposition is appended to his report as *Exhibit A-2*. A statement of the compensation to be paid to Dr. Husted for his time in this matter, along with documentation of payment made to date, are respectively appended to his report as *Exhibit A-3* and *Exhibit A-4*.

No written report or further disclosure is required respecting the remaining persons identified as experts herein, and defendants possess all records prepared by said witnesses.

Respectfully submitted,
Plaintiff, K.J.

/s/ Anthony I. Werner

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CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2022, I electronically filed the foregoing **PLAINTIFF'S EXPERT WITNESS DISCLOSURE** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record as follows:

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